

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CASE NO. 3:11-cv-00023-RJC-DCK**

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U.S. COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

KEITH F. SIMMONS, et al.,

Defendants, and

LAWRENCE SALAZAR, et al.,

Relief Defendants.

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**PLAINTIFF’S MOTION AND SUPPORTING MEMORANDUM FOR ENTRY OF  
DEFAULT JUDGMENT, PERMANENT INJUNCTION, CIVIL MONETARY  
PENALTIES, AND ANCILLARY EQUITABLE RELIEF AGAINST DEFENDANTS  
GENESIS WEALTH MANAGEMENT, LLC, DIVINE CIRCULATION SERVICES,  
LLC, DIVINE STEWARDSHIP, LLC, SAFE HARBOR VENTURES, INC., SAFE  
HARBOR WEALTH INVESTMENTS, INC., AND SAFE HARBOR WEALTH, INC.,  
AND RELIEF DEFENDANTS BLACK DIAMOND ASSOCIATES, LLC, COATS  
ESTATE PLANNING SERVICES, INC., COATS WEALTH MANAGEMENT, INC.,  
ECO-GREEN, LLC, THE GALLERY GROUP, LLC, HIGH SOUTH REALTY, LLC,  
AND SOVEREIGN GRACE, INC.**

Pursuant to Federal Rule of Civil Procedure (“Fed. R. Civ. P.”) 55(b)(2) and Local Rule 7.1, Plaintiff U.S. Commodity Futures Trading Commission (“CFTC”) now hereby respectfully moves the Court to enter a final judgment by default against Defendants Genesis Wealth Management, LLC (“GWM”), Divine Circulation Services, LLC (“DCS”), Divine Stewardship, LLC (“Divine Stewardship”), Safe Harbor Ventures, Inc. (“SHV”), Safe Harbor Wealth Investments, Inc. (“SHWI”), and Safe Harbor Wealth, Inc. (“SHW”), and Relief Defendants

Black Diamond Associates, LLC (“Black Diamond Associates”), Coats Estate Planning Services, Inc. (“Coats Estate”), Coats Wealth Management, Inc. (“Coats Wealth”), Eco-Green, LLC (“Eco-Green”), The Gallery Group, LLC (“Gallery Group”), High South Realty, LLC (“High South”), and Sovereign Grace, Inc. (“Sovereign Grace”) for their failure to plead or otherwise defend this action, and to issue a final order in the form of the proposed order filed contemporaneously with this Motion. As more fully set forth in Plaintiff’s contemporaneously filed supporting memorandum, Plaintiff is entitled to final judgment by default as a matter of law against Defendants and Relief Defendants.

Pursuant to Local Rule 7.1(B), the requirement to confer does not apply to this Motion.

Respectfully submitted,

**s/ Alan Edelman**

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Trading Commission

Dated: May 1, 2017

## CERTIFICATE OF SERVICE

I hereby certify that on this 1<sup>st</sup> day of May 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served on all parties or counsel of record identified below in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing:

1. Defendant Bryan Coats, *pro se*  
Register #26822-058  
FPC Montgomery  
Federal Prison Camp  
Maxwell Air Force Base  
Montgomery, Alabama 36112  
[via U.S. Mail]
2. Defendant Jonathan Davey, *pro se*  
Register #27328-058  
FCI Elkton  
P.O. Box 10  
Lisbon, Ohio 44432  
[via U.S. mail]
3. Defendant Genesis Wealth Management, LLC Relief Defendants Coats Estate Planning Services, Inc. and Coats Wealth Management, Inc.  
c/o Bryan Coats  
Register #26822-058  
FPC Montgomery  
Federal Prison Camp  
Maxwell Air Force Base  
Montgomery, Alabama 36112  
[via U.S. Mail]
4. Defendants Divine Circulation Services, LLC, Divine Stewardship, LLC, Safe Harbor Ventures, Inc., Safe Harbor Wealth Investments, Inc., and Safe Harbor Wealth, Inc. and Relief Defendant Sovereign Grace, Inc.  
c/o Jonathan Davey  
Register #27328-058  
FCI Elkton  
P.O. Box 10  
Lisbon, Ohio 44432  
[via U.S. mail]

5. Relief Defendants Black Diamond Associates, LLC, Eco-Green, LLC, The Gallery Group, LLC, and High South Realty, LLC  
c/o Keith Simmons  
Register #24251-058  
USP Lee  
U.S. Penitentiary  
P.O. Box 305  
Jonesville, Virginia 24263
6. Benjamin Bain-Creed  
United States Attorney's Office for the Western District of North Carolina  
227 West Trade Street, Suite 1650 Charlotte, NC 28202  
(704) 338-3111  
Attorney for Intervener United States Government  
[via CM/ECF]

**s/ Alan Edelman**